1 Hon. Andrew Guilford, Ret. 1851 E. First St. Suite 1600 2 Santa Ana, CA 92705 (714) 834-1340 3 4 UNITED STATES DISTRICT COURT 5 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION IN RE: TOLL ROADS LITIGATION 6 Case No.: 8:16 - cv - 00262 - ODW (JCGx) 7 PENNY DAVIDI BORSUK; DAVID COULTER; EBRAHIM E. MAHDA; TODD QUARLES; TODD PROPOSED PLAN OF COMPENSATION FOR THE CARPENTER: LORI MYERS: DAN GOLKA: AND 8 SPECIAL MASTER JAMES WATKINS ON BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED, 9 Plaintiff. 10 11 VS. FOOTHILL/EASTERN TRANSPORTAION 12 CORRIDOR AGENCY; SAN JOAQUIN HILLS TRANSPORTATION CORRIDOR AGENCY; 13 ORANGE COUNTY TRANSPORTATION AUTHORITY; 3M COMPANY; BRIC-TPS, LLC; 14 RHONDA REARDON; MICHAEL KRAMAN; CRAIG YOUNG; SCOTT SCHOEFFEL; ROSS CHUN; 15 DARRELL JOHNSON; LORI DONCHAK; COFIROUTE USA, LLC, 16 Defendants. 17 The proposed Special Master Andrew J. Guilford submits to the Court the following plan for 18 compensation. 19 The Special Master will charge no more than \$1,200 an hour for his time. The Special Master 20 intends to use input from an experienced research attorney at Judicate West in performing tasks such as document 21 review and legal research. Any potential assisting attorney will be disclosed to the parties for consideration before 22 performing any work on the case. Such professionals will be billed at no more than \$300 per hour. 23 24 25 Dated: August 3, 2020 26 27 28 PROPOSED PLAN OF COMPENSATION FOR THE SPECIAL MASTER